

TITLE V PERMIT ENGINEERING EVALUATION

YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

1947 Galileo Court, Suite 103, Davis, CA 95616

APPLICATION NUMBER: A-1-95F
APPLICATION COMPLETENESS DATE: 12 Dec 1995

EVALUATION COMPLETENESS DATE: 18 Dec 1997

DISTRICT ENGINEER: Jon Costantino

SIC CODE: 2032

FACILITY INFORMATION:

Facility Name: International Home Foods, Inc.
Location: 500 Crocker Drive; Vacaville, CA
Mailing Address: 500 Crocker Drive; Vacaville, CA
Responsible Official: Michael D. Harold, Sr.
Site Contact Person: Michael J. Reilly

FACILITY DESCRIPTION:

International Home Food, Incorporated's Vacaville facility produces canned food products, including Chef Boyardee, Rotel, and Dennison brands. The products are warehoused on-site awaiting shipment to customers. Flour (durum and hard wheat), tomatoes, meat, beans, and dried pasta are the primary raw material used at the facility, along with a variety of other food stuffs; including liquid sugar, spices and vegetable oil. Cans are manufactured off-site and are filled at this facility.

The food processing operation requires large quantities of steam for cooking. The steam is produced by five industrial boilers burning only natural gas. Until recently, seven boilers were present at the facility, however, two have recently been removed. Similarly, #6 fuel oil was recently utilized as a back-up fuel for the boilers, however, piping has recently been disconnected and storage tanks have been removed. No back-up fuel capability is now available. Associated with the steam system are eight cooling towers, four of which include only non-contact cooling water. The facility maintains a fire suppression system which includes two diesel-fired water pumps (one primary and one back-up). Finally a diesel-fueled generator provides emergency power for lighting in the warehouse.

The flour arrives at the facility in bulk and is handled through a pneumatic conveying system. Emissions from the flour handling system are controlled by five

baghouses. Wastewater is either discharged to the local Publicly-Owned Treatment Works or is utilized in an off-site agricultural irrigation system.

During most of the year, boilers are operated to produce a maximum of 72,000 pounds of steam per hour. However, during the tomato harvesting season, activity increases for a period of up to 13 weeks (typically, July, August, and September) to take advantage of local tomato supplies. During that period, all boilers are utilized to maximize production capacity. At any time during the year, the boilers may undergo start-up and shutdown procedures to accommodate steam demands, other operational requirements, inspection procedures, or maintenance needs. In addition, regular maintenance and non-routine activities occur at the site and will continue to occur in the future.

INSIGNIFICANT EMISSIONS UNIT INFORMATION

- | | |
|------------------|--|
| Cooling Tower #2 | This facility has a non-contact cooling water tower, this is an insignificant emissions unit based upon the District's exemption rule. (Rule 3.2 section 112). |
| Cooling Tower #6 | This facility has a non-contact cooling water tower, this is an insignificant emissions unit based upon the District's exemption rule. (Rule 3.2 section 112). |
| Cooling Tower #7 | This facility has a non-contact cooling water tower, this is an insignificant emissions unit based upon the District's exemption rule. (Rule 3.2 section 112). |
| Cooling Tower #8 | This facility has a non-contact cooling water tower, this is an insignificant emissions unit based upon the District's exemption rule. (Rule 3.2 section 112). |
| Degreaser | This facility has a solvent rinsing container, this is an insignificant emissions unit based upon the District's exemption rule. (Rule 3.2 section 110.3). The solvent used has been demonstrated not to be covered by any applicable Federal Requirement. |

Bulk Tomato
Processing

This facility receives and handles bulk tomatoes, this is an insignificant emissions unit based upon the District's exemption rule. (Rule 3.2 section 113).

Petroleum
Lubricant Tanks

This facility has six tanks ranging from 225 gallons to 350 gallons containing lubricating oils and waste lubricants, these are insignificant emissions units based upon the District's exemption rule. (Rule 3.2 section 109.2).

SIGNIFICANT EMISSIONS UNIT INFORMATION

COMBUSTION UNITS

Permit #P-24-98

PROCESS DESCRIPTION: Steam Production

EQUIPMENT INVENTORY:

Boiler #1 Wickes Boiler Co., Model #WD0G26, Serial# 65008-1. 60,000 lb steam per hr, 84.9 mmbtu/hr. PUC regulated natural gas fired only.

Permit #P-23-98

PROCESS DESCRIPTION: Steam Production

EQUIPMENT INVENTORY:

Boiler #2 Wickes Boiler Co., Model #WD0G26, Serial# 65008-2. 60,000 lb steam per hr, 84.9 mmbtu/hr. PUC regulated natural gas fired only.

Permit #P-20-98

PROCESS DESCRIPTION: Steam Production

EQUIPMENT INVENTORY:

Boiler #3 Wickes Boiler Co., Model #WD0G26, Serial# 65008-3. 60,000 lb steam per hr, 84.9 mmbtu/hr. PUC regulated natural gas fired only.

Permit #P-21-98

PROCESS DESCRIPTION: Steam Production

EQUIPMENT INVENTORY:

Boiler #4 Zurn Industries, Type: Keystone, Serial #98484, 72,000 lb steam per hr, 99.2 mmbtu/hr. PUC regulated natural gas fired only.

Permit #P-22-98

PROCESS DESCRIPTION: Steam Production

EQUIPMENT INVENTORY:

Boiler#5

Zurn Industries, Type: Keystone, Serial #98892,
72,000 lb steam per hr, 99.2 mmbtu/hr. PUC
regulated natural gas fired only.

Permit #P-84-94(t)**PROCESS DESCRIPTION:**

Internal combustion engine to power an
emergency fire pump, 170 Brake Horsepower.

EQUIPMENT INVENTORY:

One Cummins Model No. NT-495-FP internal
combustion engine, Serial No. 25158261, 170
BHP, 4-cycle, diesel fueled, aftercooled.

Permit #P-8-96(t)**PROCESS DESCRIPTION:**

Stationary Internal Combustion Engine Over 50
HP used in emergencies to power a pump.

EQUIPMENT INVENTORY:

One (1) Detroit Diesel IC Engine Model No.
DDFPL6AT, Serial No. 6VA-1, 305 BHP, 2-cycle,
diesel fueled, turbocharged.

Permit #P-9-96(t)**PROCESS DESCRIPTION:**

Stationary Internal Combustion Engine Over 50
HP used in emergencies to power a generator.

EQUIPMENT INVENTORY:

One (1) Cummins IC Engine Model No. 4B3.9-G,
Serial No. 45134752, 68 BHP, 4-cycle, diesel
fueled.

GENERAL EMISSION UNITS**Permit #P-41-72(t)****PROCESS DESCRIPTION:**

Cooling Towers

EQUIPMENT INVENTORY:

Cooling Tower #1

Marley double-flow cooling tower, Model #459-103
designed with a maximum throughput rate of 5,250
gpm.

Cooling Tower #3

Marley double-flow cooling tower, Model #457-202
designed with a maximum throughput rate of 800 gpm.

Cooling Tower #4	Marley double-flow cooling tower, Model #457-202 designed with a maximum throughput rate of 800 gpm.
Cooling Tower #5	Marley double-flow cooling tower, Model #457-202 designed with a maximum throughput rate of 800 gpm.

Permit #P-38-72(t)

PROCESS DESCRIPTION: Pneumatic Flour Handling System

EQUIPMENT INVENTORY:

Durum Flour System:

Blowers, Airlock/Airlock Valves, Bulk Feed Screws, Surge Bin, Sifter, Spaghetti Hopper, and Spaghetti Blower.

Hard Wheat Flour System:

Blowers, Airlock/Airlock Valves, Bulk Feed Screws, Surge bin, Sifter, Ravioli hoppers, and Area valves.

CONTROL EQUIPMENT INVENTORY:

Dust Collectors	(2)	Two Semco 1150 cfm bag filter dust collectors, Model DC TF1455308.
Blower	(1)	Unloading, 3 HP.
Rotary Gate	(1)	0.5 HP.
Bag Cleaner	(1)	1 HP.

Permit #P-17-75(t)

PROCESS DESCRIPTION: Wastewater Effluent Disposal

EQUIPMENT INVENTORY:

2 Pumps	Supply pumps at plant site. Mfr: Gorman Rupp, Model: T6A60-B, 30 HP each.
2 Pumps	Recirculation pumps at field. Mfr: Cornell, Model: 6HHDHVS20-6, 20 HP each.
1 Pump	Recirculation pump in pond. Mfr: Gorman Rupp, 50 HP, Model T8A3-B.

CONTROL EQUIPMENT INVENTORY:

Aerator #1	30 HP
Aerator #2	25 HP
Aerator #3	15 HP
Aerator #4	15 HP
Aerator #5	25 HP

FACILITY EMISSIONS SUMMARY

Criteria Pollutant Emissions (tons per year)					
Emission Unit Name	NO _x	SO _x	VOC	CO	PM ₁₀
Boiler #1	7.23	0.17	0.78	58.66	1.72
Boiler #2	7.23	0.17	0.78	58.66	1.72
Boiler #3	7.23	0.17	0.78	58.66	1.72
Boiler #4	8.45	0.19	0.91	68.55	2.01
Boiler #5	8.45	0.19	0.91	68.55	2.01
Cooling Towers #1,3,4, and 5	0.00	0.00	0.00	0.00	1.42
Four Handling System	0.00	0.00	0.00	0.00	0.71
Wastewater Effluent Disposal	0.00	0.00	0.00	0.00	0.00
IC Engine #2-Primary Fire Pump	0.37	0.01	0.04	0.08	0.03
IC Engine #1-Back Up Fire Pump	0.41	0.01	0.04	0.09	0.03
IC Engine #3-Electrical Generator	0.09	0.00	0.01	0.02	0.01
Other Regulated Air Pollutant Emissions (tons per year)					
Emission Unit Name	HAP	HAP	HAP	HAP	HAP
No reportable quantities					

APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

FACILITY WIDE REQUIREMENTS

RULE 2.3 Ringelmann Chart

Rule Description

This rule specifies the standards for allowable opacity standards for all processes.

Compliance Status

International Home Foods, Inc. currently is in compliance with this rule. There are no outstanding Notices of Correction or Violation.

RULE 2.5 Nuisance

Rule Description

This rule specifies that no source shall create a public nuisance and establishes the standards for determining when a public nuisance has occurred.

Compliance Status

International Home Foods, Inc. currently is in compliance with this rule. There are no outstanding Notices of Correction or Violation. No complaints with respect to a public nuisance are currently on file with the District.

RULE 2.7 Wet Plumes

Rule Description

This rule specifies the standards for wet plumes and the allowable opacity standards for these processes.

Compliance Status

International Home Foods, Inc. currently is in compliance with this rule. There are no outstanding Notices of Correction or Violation.

RULE 2.11 Particulate Matter

Rule Description

This rule specifies the standards for emissions from particulate matter processes.

Compliance Status

International Home Foods, Inc. currently is in compliance with this rule. Based on annual throughput reports, International Home Foods, Inc. is in compliance with their permitted process limits. There are no outstanding Notices of Correction or Violation. The following calculation that shows compliance with this

rule. The lbs/day value and the dscf exhaust comes from the permitted values of the equipment.

RULE 2.12 Specific Contaminants

$$\frac{(5.46 \text{ lbs/day}) (7,000 \text{ grains/lb})}{(1,440 \text{ min/day}) (2,300 \text{ dscf})} 0.012 \frac{\text{grains}}{\text{dscf}} < 0.3 \frac{\text{grains}}{\text{dscf}}$$

Rule Description

This rule specifies the standards for emissions of Sulfur compounds and particulate matter combustion contaminants from all processes.

Compliance Status

International Home Foods, Inc. currently is in compliance with this rule. Based on annual throughput reports, International Home Foods, Inc. is in compliance with their permitted process limits. There are no outstanding Notices of Correction or Violation. The following calculation that shows compliance with this rule. The 14.01 lbs/day and the dscf exhaust comes from the most emissive combustion unit at the facility.

RULE 2.16 Fuel Burning Heat or Power Generation

$$\frac{(14.01 \text{ lbs/day}) (7,000 \text{ grains/lb})}{(1,440 \text{ min/day}) (11,250 \text{ dscf})} 0.0061 \frac{\text{grains}}{\text{dscf}} < 0.3 \frac{\text{grains}}{\text{dscf}}$$

Rule Description

This rule specifies the standards for emissions of NO_x and SO_x associated with fuel burning.

Compliance Status

International Home Foods, Inc. currently is in compliance with this rule. Based on annual throughput reports, International Home Foods, Inc. is in compliance with their permitted process limits. There are no outstanding Notices of Correction or Violation.

RULE 2.19 Particulate Matter Process Emission Rates

Rule Description

This rule specifies the standards for emissions of particulate matter from all processes.

Compliance Status

International Home Foods, Inc. currently is in compliance with this rule. Based on annual throughput reports, International Home Foods, Inc. is in compliance with their permitted process limits. There are no outstanding Notices of Correction or Violation.

RULE 3.1 General Permit Requirements

Rule Description

This rule provides an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

Compliance Status

International Home Foods, Inc. has active permits for all emission units which require permits.

RULE 3.4 New Source Review

Rule Description

This rule applies to all new stationary sources and emissions units and all modifications to existing stationary sources and emissions units which are subject to Rule 3.1, GENERAL PERMIT REQUIREMENTS, and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction or any other non-point source common to timber harvesting or agricultural practices. The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards.

Compliance Status

The International Home Foods, Inc. facility was constructed prior to July 26, 1979 the date of the original adoption of the District's New Source Review Rule (NSR). Since then there has been two internal combustion engines added to the facility. Both engines went through NSR and did not trigger either offsets or BACT requirements. In 1995 International Home Foods, Inc. (American Home Food Products, Inc. at the time) applied to modify the existing steam producing boilers to comply with District Rule 2.27. They were granted five Authority to Construct for the boiler retro-fits. The boiler applications went through NSR. The modifications did not trigger BACT requirements, and were exempt from any offset requirements. International Home Foods is currently in compliance with District New Source Review.

RULE 3.8 Federal Operating Permits

Rule Description

This Rule implements the requirements of Title V of the Federal Clean Air Act as amended in 1990 (CAA) for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

Compliance Status

International Home Foods, Inc. has submitted a timely and complete Title V application and is currently operating under an application shield.

RULE 5.2 Upset/Breakdown Conditions: Emergency Variance

Rule Description

This rule specifies conditions and procedures for upsets/breakdowns and emergency variances.

Compliance Status

International Home Foods, Inc. is currently in compliance. However, the facility is aware of this requirement and is prepared to notify the District in the event of an emergency or breakdown situation.

EQUIPMENT SPECIFIC REQUIREMENTS

BOILER SYSTEM (P-20-98, P-21-98, P-22-98, P-23-98, P-24-98) THREE WICKES BOILERS AND TWO ZURN BOILERS

RULE 2.27 Industrial, Institutional, and Commercial Steam Generator and Process Heaters

Rule Description

This rule applies to boilers, steam generators, and process heaters with rated heat inputs of greater than or equal to 5 million BTU per hour, used in all industrial, institutional, and commercial operations. This rule provides a control measure to limit emissions of NO_x from industrial, institutional, and commercial boilers, steam generators and process heaters in conformance with BARCT determinations approved by the California Air Resources Board to meet the requirements of the California Clean Air Act. The latest revision of this rule was board approved on 8/14/96; the rule was SIP submitted on 8/15/96; SIP approved on 6/17/97.

Compliance Status

- Section 301:** International Home Foods, Inc. has demonstrated compliance with the standards of this section.
- Section 401:** International Home Foods, Inc. has submitted a compliance plan which meets the requirement of this section. They have also submitted Authority to Construct applications as required by this section. They demonstrated compliance prior to June 1, 1998.

Section 403: International Home Foods, Inc. is subject to this requirement. Permit conditions require annual testing or tune-up reports to be submitted to the District.

Section 501: International Home Foods, Inc. submits an annual report with fuel usage and operating hours as specified in this section.

YSAQMD permits P-20-98, P-21-98, P-22-98, P-23-98, P-24-98 issued on July 7, 1998

Permit Description

These permits went through NSR when they were issued. The original boiler permit was issued in 1972 and modified in 1974, prior to the District having an NSR rule. The permit cancelled when each boiler was modified to meet the requirements of District Rule 2.27. These permits are for two steam generators and three boilers used in the production of food products, the permit gives operating conditions for the boilers. All the conditions are federally enforceable.

Compliance Status

Based on the annual District inspection, International Home Foods, Inc. is in compliance with all conditions of this permit.

COOLING TOWERS (P-41-72(t)), COOLING TOWERS #1,3,4 and 5

RULE 9.3 Hexavalent Chromium

Rule Description

This rule applies three types of users: Decorative Chrome Plating Operations, Hard Chrome Plating and Chromic Acid Anodizing, and Cooling Towers. This rule provides a control measure to limit chromium emissions from these sources. None of the cooling towers at the facility use Chromium based water treatment chemicals. Also, none of the cooling towers are subject to 40 CFR 60, Subpart Q.

Compliance Status

Section c.1 International Home Foods, Inc. does not use any chromium compounds in the treatment of any of their cooling towers.

Section c.1.b International Home Foods, Inc. has valid Permits to Operate for the cooling towers.

Section c.2

International Home Foods, Inc. is not required by the District to test for chromium compounds in the cooling water due to the fact that they don't use chromium as a treatment option.

Permit Description

This permit is not a NSR permit. It was originally issued in 1972. The permit was re-issued due to the transfer of ownership of the company, the permit was not subject NSR during the transfer of ownership. This permit is for the four non-exempt cooling towers used in the production of food products. The permit gives operating conditions for the cooling towers. Condition 8 is federally enforceable since District Rule 5.2 is SIP approved. Conditions 1 through 7, and 9 through 18 are not federally enforceable.

Compliance Status

Based on the annual District inspections, International Home Foods, Inc. is in compliance with all conditions of this permit. There are no current NOV's or NOC's for this equipment.

INTERNAL COMBUSTION ENGINES (P-84-94(t), P-8-96(t) and P-9-96(t)), IC ENGINES #1, 2 and 3

RULE 2.32 Stationary Internal Combustion Engines

Rule Description

This Rule applies to any stationary internal combustion engine rated at more than 50 brake horsepower, operated on any gaseous fuel, including liquid petroleum gas (LPG), or diesel fuel. This Rule shall not apply to engines used directly and exclusively for agricultural operations necessary for the growing of crops or the raising of fowl or animals. The purpose of this Rule is to limit the emission of oxides of nitrogen (NO_x) and carbon monoxide (CO) from stationary internal combustion engines. This Rule sets interim Reasonably Achievable Control Technology (RACT) emission limits until the California Air Resources Board publishes a Best Available Retrofit Control Technology (BARCT) determination for this source category. The latest revision of this rule was board approved on 8/10/94; the rule was SIP submitted on 8/12/94 ; Final EPA SIP approval is pending.

Compliance Status

Section 503: International Home Foods, Inc. has three current District permits, one for each IC Engine, which document that the I.C. engines are exempt from this rule. The valid Permits to Operate also ensure compliance with Section 503.

Section 503.1 International Home Foods, Inc. has provided the District with the required information to document exemption from the rule.

Section 503.2 International Home Foods, Inc. keeps a log of operating hours for each engine.

Section 503.3 International Home Foods, Inc. retains engine records for the required two years.

YSAQMD P-84-94(t) transferred permit re-issued March 3, 1997

Permit Description

This permit is not a NSR permit. The engine was not permitted until a change in the District's exemption rule in 1993. The equipment was not subject to NSR at the time of original permitting, due to the fact that it was not a new piece of equipment. The equipment was originally installed in 1987. The permit was re-issued due to the transfer of ownership of the company, the permit was not subject NSR during the transfer of ownership. This permit is one of three Permits to Operate for the non-exempt stationary internal combustion engines at the facility. This permit is a back-up unit for the fire suppression system at the facility. The permit gives operating conditions for the engine. Conditions 8, and 16 are federally enforceable since District Rules 5.2 and 2.3, respectively, are SIP approved. Conditions 19 through 24 are currently not federally enforceable, but District Rule 2.32 is pending SIP approval. Conditions 1 through 7, 9 through 15 and 25 are not federally enforceable.

Compliance Status

Based on the annual District inspections, International Home Foods, Inc. is in compliance with all conditions of this permit. There are no current NOV's or NOC's for this equipment.

YSAQMD P-8-96(t) transferred permit re-issued March 3, 1997

Permit Description

This permit is a NSR permit. The equipment was originally installed in 1995. The permit was re-issued due to the transfer of ownership of the company, the permit was not subject NSR during the transfer of ownership. This permit is one of three Permits to Operate for the non-exempt stationary internal combustion engines at the facility. This permit is the primary unit for the fire suppression system at the facility. The permit gives operating conditions for the engine. All of the conditions are federally enforceable due to the fact that this is an NSR permit.

Compliance Status

BACT was not triggered for this unit. Operational limitations placed on the Permit to Operate limit emissions below BACT trigger levels. Based on the annual District inspections, International Home Foods, Inc. is in

compliance with all conditions of this permit. There are no current NOV's or NOC's for this equipment.

YSAQMD P-9-96(t) transferred permit re-issued March 3, 1997

Permit Description

This permit is a NSR permit. The equipment was originally installed in 1995. The permit was re-issued due to the transfer of ownership of the company, the permit was not subject NSR during the transfer of ownership. This permit is one of three Permits to Operate for the non-exempt stationary internal combustion engines at the facility. This permit is an emergency power unit at the facility. The permit gives operating conditions for the engine. All of the conditions are federally enforceable due to the fact that this is an NSR permit.

Compliance Status

BACT was not triggered for this unit. Operational limitations placed on the Permit to Operate limit emissions below BACT trigger levels. Based on the annual District inspections, International Home Foods, Inc. is in compliance with all conditions of this permit. There are no current NOV's or NOC's for this equipment.

FLOUR HANDLING SYSTEM (P-38-72(t)), DURUM FLOUR SYSTEM AND HARD WHEAT FLOUR SYSTEM

YSAQMD P-38-72(t) transferred permit re-issued March 3, 1997

Permit Description

This permit is not a NSR permit. It was originally issued in 1972. The permit was re-issued due to the transfer of ownership of the company, the permit was not subject NSR during the transfer of ownership. This permit is for the flour handling system at the facility. The permit gives operating conditions for the handling system. Condition 8 is federally enforceable since District Rule 5.2 is SIP approved. Conditions 1 through 7, and 9 through 18 are not federally enforceable.

Compliance Status

Based on the annual District inspections, International Home Foods, Inc. is in compliance with all conditions of this permit. There are no current NOV's or NOC's for this equipment.

PERMANENT FIELD IRRIGATION (P-17-75(t)), WASTEWATER EFFLUENT DISPOSAL

YSAQMD P-17-75(t) transferred permit re-issued March 3, 1997

Permit Description

This permit is not a NSR permit. It was originally issued in 1972. The permit was re-issued due to the transfer of ownership of the company, the permit was not subject NSR during the transfer of ownership. This permit is for the permanent disposal off-site of wastewater effluent from the tomato processing system. The permit gives operating conditions for the disposal of the tomato processing effluent stream. Condition 8 is federally enforceable since District Rule 5.2 is SIP approved. Conditions 1 through 7, and 9 through 18 are not federally enforceable.

Compliance Status

Based on the annual District inspections, International Home Foods, Inc. is in compliance with all conditions of this permit. There are no current NOV's or NOC's for this equipment.

GENERAL REQUIREMENT CONDITIONS

Rule Citations are based on Yolo-Solano Air Quality Management Rules and Regulations in effect January 15, 1996.

Title V Federal Operating Permit Conditions

- 1. The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. (Rule 3.8 §302.15)**
- 2. An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. (Rule 3.8 §302.16)**
- 3. An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. (Rule 3.8 §402.2)**
- 4. An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions**

unit(s) shall not commence operation until the APCO approves the permit revision. (Rule 3.8 §402.3)

5. An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. (Rule 3.8 §402.4)
6. The owner or operator shall include the following in the application for a minor Title V permit modification:
 - A. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
 - B. Proposed permit terms and conditions; and
 - C. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. (Rule 3.8 §402.4)
7. An owner or operator shall supplement any complete application with additional information upon written request of the APCO, within the timeframe specified by the APCO. (Rule 3.8 §403.2a)
8. An owner or operator shall provide, within 10 days, additional information in writing to the APCO upon discovery of submittal of any inaccurate information as a part of the application or as a supplement thereto, or of any additional relevant facts previously omitted which are needed for accurate analysis of the application. (Rule 3.8 §403.2b)
9. International Home Foods, Incorporated is not subject to the requirements of 40 CFR 63, Subpart Q (MACT Standards). Chromium-based water treatment chemicals are banned within the State of California and only cooling towers using these chemicals are subject to this Standard.

Compliance

10. The permittee shall comply with all Title V permit conditions. (Rule 3.8 §302.11a.)
11. The permit does not convey property rights or exclusive privilege of any sort. (Rule 3.8 §302.11b.)
12. Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. (Rule 3.8 §302.11c.)

13. The permittee shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. (Rule 3.8 §302.11d.)
14. A pending permit action or notification of anticipated non-compliance does not stay any permit condition. (Rule 3.8 §302.11e.)
15. Within a reasonable time period, the permittee shall furnish any information requested by the APCO, in writing, for the purpose of determining:
 - A. Compliance with the permit; or
 - B. Whether or not cause exists for a permit or enforcement action.(Rule 3.8 §302.11f.)
16. The permittee shall comply with the requirements of Section 405, Rule 3.1, GENERAL PERMIT REQUIREMENTS, and the emergency provisions contained in all applicable federal requirements. (Rule 3.8 §302.12a.)
17. Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:
 - A. An emergency occurred;
 - B. The permittee can identify the cause(s) of the emergency;
 - C. The facility was being properly operated at the time of the emergency;
 - D. All steps were taken to minimize the emissions resulting from the emergency; and
 - E. Within two working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigating or corrective actions taken. (Rule 3.8 §302.12b.)
18. In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred. (Rule 3.8 §302.12c.)
19. Right of Entry - The Yolo-Solano Air Quality Management District, the Executive Officer of the California Air Resources Board, the EPA Regional Administrator and/or their authorized representatives, upon the presentation of credentials, shall be permitted:
 - A. To enter upon the premises where the emission source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - B. At reasonable times to have access to and copy any records required to be kept under terms and conditions of this permit;
 - C. To inspect any equipment, operation, or method required in this permit; and
 - D. To obtain samples from the emission source or require samples to be taken. (Rule 3.8 §302.10)

20. Severability - If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. (Rule 3.8 §302.13)
21. Except as otherwise permitted by law, the permittee shall not release or discharge into the atmosphere, particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated standard conditions. (Rule 2.11, SIP Approved 6/14/78)
22. The permittee shall not discharge into the atmosphere from any single source of emission whatsoever, any one or more of the following contaminants, in any state or combination thereof, in excess of the following concentrations at the point of discharge:
 - A. Sulfur compounds calculated as sulfur dioxide (SO₂) 0.2 percent, by volume at standard conditions.
 - B. Particulate Matter Combustion Contaminants: 0.3 grains per cubic foot of gas calculated to 12 percent of carbon dioxide (CO₂) at standard conditions, except during the start of an operation or change in energy source, during the time necessary to bring the combustion process up to operating level. (Rule 2.12, SIP Approved 5/31/72)
23. The permittee shall comply with hourly particulate emission rates based on the hourly material throughput as follows:

PROCESS WEIGHT VS ALLOWABLE EMISSION RATE PER HOUR

<u>Process Weight Allowable [Lbs/Hr]</u>		<u>Emission Rate [Lbs/Hr]</u>
More Than	To and Including	
0	400	1
400	800	2
800	1,500	3
1,500	2,200	4
2,200	2,900	5
2,900	4,100	6
4,100	5,400	7
5,400	7,000	8
7,000	8,500	9
8500	10,000	10
10,000	11,600	11
11600	13,200	12
13,200	14,800	13
14,800	16,400	14

16,400	18,000	15
18,000	19,600	16
19,600	21,300	17
21,300	23,000	18
23,000	24,700	19
24,700	26,500	20
26,500	28,300	21
28,300	30,000	22
30,000	31,700	23
31,700	33,300	24
33,300	35,000	25
35,000	36,700	26
36,700	38,300	27
38,300	40,000	28
40,000	41,700	29
41,700	43,300	30
43,300	45,000	31
45,000	46,700	32
46,700	48,300	33
48,300	50,000	34
50,000	51,700	35
51,700	53,300	36
53,300	55,000	37
55,000	56,700	38
56,700	58,300	39
58,300	-----	40

(Rule 2.19, SIP Approved 6/14/78)

Recordkeeping and Reporting Conditions

24. Records shall be maintained of all monitoring and support information required by any applicable federal requirement, including:
 - A. Date, place, and time of sampling;
 - B. Operating conditions at the time of sampling;
 - C. Date, place, and method of analysis; and
 - D. Results of the analysis. (Rule 3.8 §302.6a)
25. Records shall be retained for all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. (Rule 3.8 §302.6b)
26. Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be reported to the APCO within 10 calendar days. (Rule 3.8 §302.7a)

27. A monitoring report shall be submitted at least every six months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7. a of Rule 3.8. (Rule 3.8 §302.7b)
28. All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. (Rule 3.8 §302.7c)
29. Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. (Rule 3.8 §302.7e)
30. The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every 12 months unless required more frequently by an applicable requirement. (Rule 3.8 §302.14a)
31. The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. (Rule 3.8 §302.14b)
32. The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. (Rule 3.8 §302.14c)
33. The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. (Rule 3.8 §302.14d)

Facility Wide Operating Conditions

(The following conditions are District enforceable only for all permits except (P-8-96(t), P-9-96(t), P-20-98, P-21-98, P-22-98, P-23-98, and P-24-98)).

34. No modifications to the process, types or quantities of materials used, as presented with the Permit to Operate application, shall be made without prior District approval.
35. Operation shall be conducted in compliance with all data and specifications submitted with the application under which the permit is issued.

36. All persons involved with the process and maintenance activities of the permitted process shall be made aware of these conditions and abide by them accordingly.
37. The Permit to Operate and a copy of these conditions shall be posted on site, clearly visible and readily available upon request.
38. The equipment associated with the approved process shall be properly maintained and kept in good operating condition to ensure compliance and prevent exceeding the permitted emission limits at all times except during times of repair or breakdown.
39. An annual throughput/production report shall be submitted at the end of each calendar year. This report is due no later than March 31, for the previous year. This report must include operating hours, and amounts of materials processed. Each type of material and each type of process must be listed separately.
40. The District may request in writing from the permitted source: plans, specifications, records, samples or other information that will disclose the nature, extent, quantity or degree of air contaminants that are, or may be, emitted by the facility. If the permitted source feels that trade secrets are unreasonably being requested by the District, they may appeal directly to the Board of Directors.
41. The District may suspend the permit if, within a reasonable time, the permitted source willfully fails or refuses to furnish requested information, analyses, plans or specifications relating to emissions from the source for which the permit was issued.
42. In the event that any of the equipment is found to be in violation of District Rules and Regulations, the permitted source shall be liable for violations up to the maximum allowed by law. The penalties are accrued on a daily basis. The permitted source shall operate the violating piece of equipment under the risk of full penalty by the District.
43. Non-compliance with any permit condition is grounds for permit termination, enforcement action, or denial of permit renewal.
44. Any changes in operation schedule or process shall be reported to the District immediately.
45. Any changes in ownership, address or alteration shall be reported, in writing to the District, prior to the changes. Such changes may require prior District approval.

EQUIPMENT OR EMISSION UNIT SPECIFIC CONDITIONS

BOILER SYSTEM (P-20-98, P-21-98, P-22-98, P-23-98, P-24-98) THREE WICKES BOILERS AND TWO ZURN BOILERS

Federally Enforceable Requirement Conditions

46. Units with rated heat inputs of greater than or equal to 5 million BTU per hour and annual heat inputs of greater than or equal to 90,000 therms for any three previous calendar years, NO_x emissions shall not exceed the following levels:

A. 30 parts per million by volume (ppmv), or 0.036 pound per million BTU of heat input when operated on gas.

Emissions from units subject to this condition shall not exceed a carbon monoxide concentration of 400 parts per million by volume (ppmv). (Rule 2.27 §301, Adopted 8/14/96)

47. N/A, An earlier version contained a condition listing a future compliance date for District Rule 2.27. The condition has since been satisfactorily met, therefore the previous language is no longer applicable.
48. N/A, An earlier version contained a condition listing a future compliance date for District Rule 2.27. The condition has since been satisfactorily met, therefore the previous language is no longer applicable.
49. International Home Foods, Inc. shall, conduct annually either a tune-up or compliance source test.. A compliance source test for NO_x and CO shall be performed, at a minimum, triennially.
- A. The source test shall be conducted in accordance with an approved source test protocol. The source test protocol shall be submitted to the District two weeks prior to proposed test date. Source test results shall be submitted to the District compliance staff within 60 days of the test date.
- B. Test reports shall include the operational characteristics of all NO_x reduction equipment sufficient with determining compliance, including any information collected via data collection devices. Such measurements may include, but are not limited to, the oxygen concentration, CO concentration, stack-gas temperatures, and/or any other data necessary to accurately assess the effectiveness of the NO_x reduction equipment.
- C. The first test or tune-up report, for each unit shall be submitted by December 31, 1998.
- D. Compliance with NO_x emission requirements and the stack-gas carbon monoxide and oxygen requirements shall be determined using the following test methods:

1. Oxides of Nitrogen - ARB Method 100.
2. Carbon Monoxide - ARB Method 100.
3. Stack-Gas Oxygen - ARB Method 100.
4. NO_x Emission Rate (Heat Input Basis) -EPA Method 19. (Rule 2.27 §403, Adopted 8/14/96)

50. The owners or operators shall monitor and record for each unit the HHV and cumulative annual usage of each fuel and the cumulative annual hours of operation during shut-down, the period of time a unit is cooled from its operating temperature to ambient temperature, or the time specified by the unit manufacturer and start-up, the period of time a unit is heated from ambient temperature to its operating temperature, or the time specified by the unit manufacturer. The records shall be updated weekly and made available to the District upon request. Historical annual data for the five previous calendar years shall be kept and made available to the District upon request. (Rule 2.27 §501, Adopted 8/14/96)
51. International Home Foods, Inc. shall not build, expand, or operate any non-mobile fuel burning equipment for a heat or power generator unit unless the discharge into the atmosphere of contaminants will not and does not exceed any one or more of the following rates:
- A. 200 pounds per hour of sulfur compounds, calculated as sulfur dioxide (SO₂);
 - B. 140 pounds per hour of nitrogen oxides, calculated as nitrogen dioxide (NO₂);
 - C. 40 pounds per hour of combustion particulate derived from the fuel.
- (Rule 2.16, SIP Approved 1/29/79)

COOLING TOWERS (P-41-72(t)), COOLING TOWERS #1,3,4 and 5

Federally Enforceable Requirement Conditions

(The following condition is District enforceable it will become immediately Federally enforceable upon promulgation of SIP approval by EPA)

52. International Home Foods, Inc. shall not use or allow the use of chromium containing compounds in the treatment of cooling tower circulating water. (Rule 9.3, §c.1)

INTERNAL COMBUSTION ENGINES (P-84-94(t), P-8-96(t) and P-9-96(t)), IC ENGINES #1,2 and 3

Federally Enforceable Requirement Conditions

(The following conditions are District enforceable they will become immediately Federally enforceable upon promulgation of SIP approval by EPA)

53. To remain exempt under Rule 2.32 the emergency standby engine shall be maintained and tested for no more than 50 hours per calendar year. (Rule 2.32 §110.3, Adopted 8/10/94)
54. Any owner or operator claiming an exemption under Section 110 of District rule 2.32 shall submit support documentation identifying reasons for the exemption. Such documentation shall contain a list that provides the following for each engine:
 - A.. Permit to Operate number;
 - B. Engine manufacturer;
 - C. Model designation;
 - D. Rated brake horsepower;
 - E. Type of fuel and type of ignition. (Rule 2.32 §503.1)
55. The owner or operator shall maintain a log of operating hours for each engine. (Rule 2.32 §503.2, Adopted 8/10/94)
56. The operating log shall be available to the Air Pollution Control Officer upon request. (Rule 2.32 §503.3, Adopted 8/10/94)
57. International Home Foods, Inc. shall not build, expand, or operate any non-mobile fuel burning equipment for a heat or power generator unit unless the discharge into the atmosphere of contaminants will not and does not exceed any one or more of the following rates:
 - A. 200 pounds per hour of sulfur compounds, calculated as sulfur dioxide (SO₂);
 - B. 140 pounds per hour of nitrogen oxides, calculated as nitrogen dioxide (NO₂);
 - C. 40 pounds per hour of combustion particulate derived from the fuel. (Rule 2.16, SIP Approved 1/29/79)

Non-federally Enforceable Requirement Conditions

58. Operations shall comply with District Rule 2.32. (Rule 3.1 §402, Adopted 2/23/94)
59. The emergency standby engine shall only be used when normal power line or natural gas service fails; or for the emergency pumping of water for either fire protection or flood relief. The emergency standby engine may not be operated to supplement a primary power source when the load capacity or rating of the primary power source has either been reached or exceeded. (Rule 3.1 §402, Adopted 2/23/94)

FLOUR HANDLING SYSTEM (P-38-72(t)), DURUM FLOUR SYSTEM AND HARD WHEAT FLOUR SYSTEM

60. International Home Foods, Inc. shall inspect daily while in operation all baghouses for evidence of particulate matter breakthrough, and replace bags as necessary. At least one set of spare filters shall be maintained on premises at all times. (Rule 3.1 §402, Adopted 2/23/94)
61. Records shall be kept of inspections and maintenance procedures. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of the inspection and the initials of the personnel performing the inspection. (Rule 3.1 §402, Adopted 2/23/94)

PERMANENT FIELD IRRIGATION (P-17-75(t)), WASTEWATER EFFLUENT DISPOSAL

62. International Home Foods, Inc. shall inspect daily, during operation, the permitted aerators are functioning. An inspection record shall be maintained, which includes; date of inspection, any corrective action taken as a result of the inspection and the initials of the personnel performing the inspection.

Evaluating Engineer: _____

Date: _____

Associate Air Quality Engineer

Reviewed By: _____

Date: _____

Supervising Air Quality Engineer

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